

**Technology and Equipment
Committee Meeting**

August 29, 2007

**MRI
Material**

Material Related To

MRI Petition-2: Ashe Memorial Hospital



Ashe Memorial Hospital

PETITION FOR AN ADJUSTED NEED DETERMINATION FOR ONE FIXED MRI SCANNER FOR ASHE COUNTY IN THE 2008 SMFP

Petitioner:

Ashe Memorial Hospital
200 Hospital Avenue
Jefferson, North Carolina 28640

R.D. Williams, Chief Executive Officer
(336) 846-7101

DFS Health Planning
RECEIVED

AUG 03 2007

Medical Facilities
PLANNING SECTION

To:

Medical Facilities Planning Section
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

Requested Change:

Ashe Memorial Hospital (AMH) seeks to provide increased access to fixed MRI services for residents of Ashe County and petitions for an adjusted need determination for one fixed MRI scanner for Ashe County in the 2008 SMFP. There are a number of reasons that justify an adjusted need determination:

- Due to limited mobile access, the hospital is sometimes unable to meet the diagnostic imaging needs of its inpatients and must transfer them to another facility located in another county, further from their home.
- Ashe County has a very high percent of patient emigration seeking available MRI services outside the county.

- The relatively low MRI use rate in Ashe County is indicative of a lack of access to services and of the need for increased access via a full-time fixed MRI scanner at the hospital.
- Given the limited access to mobile MRI services and the inability to increase mobile availability, it is virtually impossible for AMH to experience the growth necessary to trigger a fixed MRI need determination using the standard methodology.
- Ashe County has never had a need determination for a fixed MRI scanner.
- The lack of a need determination for a fixed MRI scanner in Ashe County has negative cost implications for patients and providers.
- Mobile MRI services are not the most effective option from an operational or patient perspective.

Approval of this petition will enable AMH to submit a Certificate of Need application to install the first fixed MRI scanner in Ashe County.

The detailed rationale is described below:

Reasons Supporting Requested Change:

Mobile MRI Access

AMH is a not-for-profit hospital located in the Blue Ridge Mountains, in the northwestern corner of North Carolina. AMH is a rural hospital that has a remarkably sophisticated level of care. Recently, AMH had the honor of being selected the 2006/2007 Outstanding Rural Health Organization of The Year.

AMH began offering MRI services over 14 years ago. As the size of the Medical Staff increased and as patient care protocols trended to regularly utilize diagnostic MRI, AMH responded by contracting with a mobile MRI provider to obtain mobile MRI services. This was the first offering of MRI services in Ashe County and immediately benefited patients. Historically, local residents have demonstrated an increasing demand for MRI services by increasing MRI utilization each year.

Currently, AMH's mobile MRI service is available only two days (Sunday and Wednesday) each week. Due to steadily increasing volumes and the increase in medical practice patterns that utilize MRI as a common diagnostic measure, AMH has requested additional mobile days from its mobile provider. However,

the mobile vendor has been unable to expand its service to AMH due to commitments elsewhere on their routes.

Additionally, as an acute care provider with a busy Emergency Department, AMH needs to have MRI services available 24/7 for inpatients and emergency cases. Due to lack of availability of its mobile scanner, the hospital sometimes is unable to meet the diagnostic imaging needs of some of its inpatients and must transfer them to another facility. Consequently, in 2006, Ashe performed only 75 inpatient MRI procedures compared to 97 inpatient MRI procedures in 2005. In fact, last year, AMH had to transfer ten inpatients to an alternate facility because the mobile MRI scanner was not on-site. Transferring inpatients out of the hospital because of unavailability of a timely MRI scan is a difficult pill to swallow for a small rural hospital, and is costly and inconvenient for the patient and their family.

Based on the Proposed 2008 SMFP data, AMH is 262 weighted MRI scans (484 unweighted MRI scans) away from triggering a need determination for a fixed MRI scanner. However, given the limited access to mobile MRI services and the inability to increase mobile availability, it is extremely difficult for AMH to experience the 40% growth necessary to trigger a fixed MRI need determination. As mentioned previously, due to lack of availability of its mobile scanner, AMH performed only 75 inpatient MRI procedures in 2006 compared to 97 inpatient MRI procedures in 2005.

As stated previously, AMH provides mobile MRI services Sunday and Wednesday each week. While AMH is grateful to have this access, providing mobile MRI services on Sundays is less than ideal. In addition to waiting several days to schedule an exam (there is a 10 day wait for an open MRI appointment as of August 1st), patients in the rural South are reluctant to schedule MRI scans on Sundays; therefore, many patients choose to seek alternative, more convenient MRI services outside the county. Consequently, AMH's annualized FY2007 utilization (based on October 2006-June 2007 data) is projected to decrease by nearly 10%.

In summary, despite the best efforts of AMH to improve MRI availability, the current mobile MRI service is insufficient to meet the needs of AMH and of Ashe County residents. The limited MRI access, and inconvenient days of availability are not conducive to enabling AMH to increase its MRI volume, and thereby trigger need for a fixed MRI scanner via the standard SMFP methodology. It is very clear that Ashe County merits an adjusted need determination in recognition of these unique circumstances.

MRI Emigration

Residents of Ashe County are utilizing MRI services, as they and their physicians recognize the benefits of this powerful diagnostic imaging modality. However, each year an increasing number of local patients are forced to travel out of county for MRI services because they are not readily available locally.

AMH, the only hospital in Ashe County, is located in the heart of the Blue Ridge Mountains. The closest fixed MRI provider is located nearly 40 minutes away in Boone. According to patient origin information provided by the Division of Health Service Regulation (DHSR) Planning Section, in 2006, over 73% of Ashe County MRI patients travel to Watauga County for MRI services because they are not available on a full-time basis locally. It is important to consider this statistic from an individual perspective to appreciate the significance. As the following table summarizes, during the past four years nearly 3,000 Ashe County residents have had to travel to Watauga County for MRI services.

Ashe County MRI Emigration

Year	Total Ashe County MRI Patients	Ashe County Patients Traveling to Watauga County	% Emigration to Watauga County
2003	693	496	71.6%
2004	947	633	66.8%
2005	993	651	65.6%
2006	1,508	1,106	73.3%

Source: 2003-2006 MRI Patient Origin Report provided by DHSR Planning Section

Please note that in 2006, 1,106 patients traveled to Watauga County for fixed MRI services. This number nearly doubled from the previous year. This is simply not acceptable. It is unreasonable to expect that residents of Ashe County should have to travel so far outside their own county to obtain timely access to MRI services. Even for a rural mountainous community, MRI is considered a mainstream diagnostic imaging service, and thus should be available locally on a full-time basis. In 2007, there is no good reason why North Carolina residents should travel to a medical center located 40 minutes away in another county. Furthermore, this is not consistent with the State's basic health planning principles of expanding access to services, and of promoting cost-effective approaches.

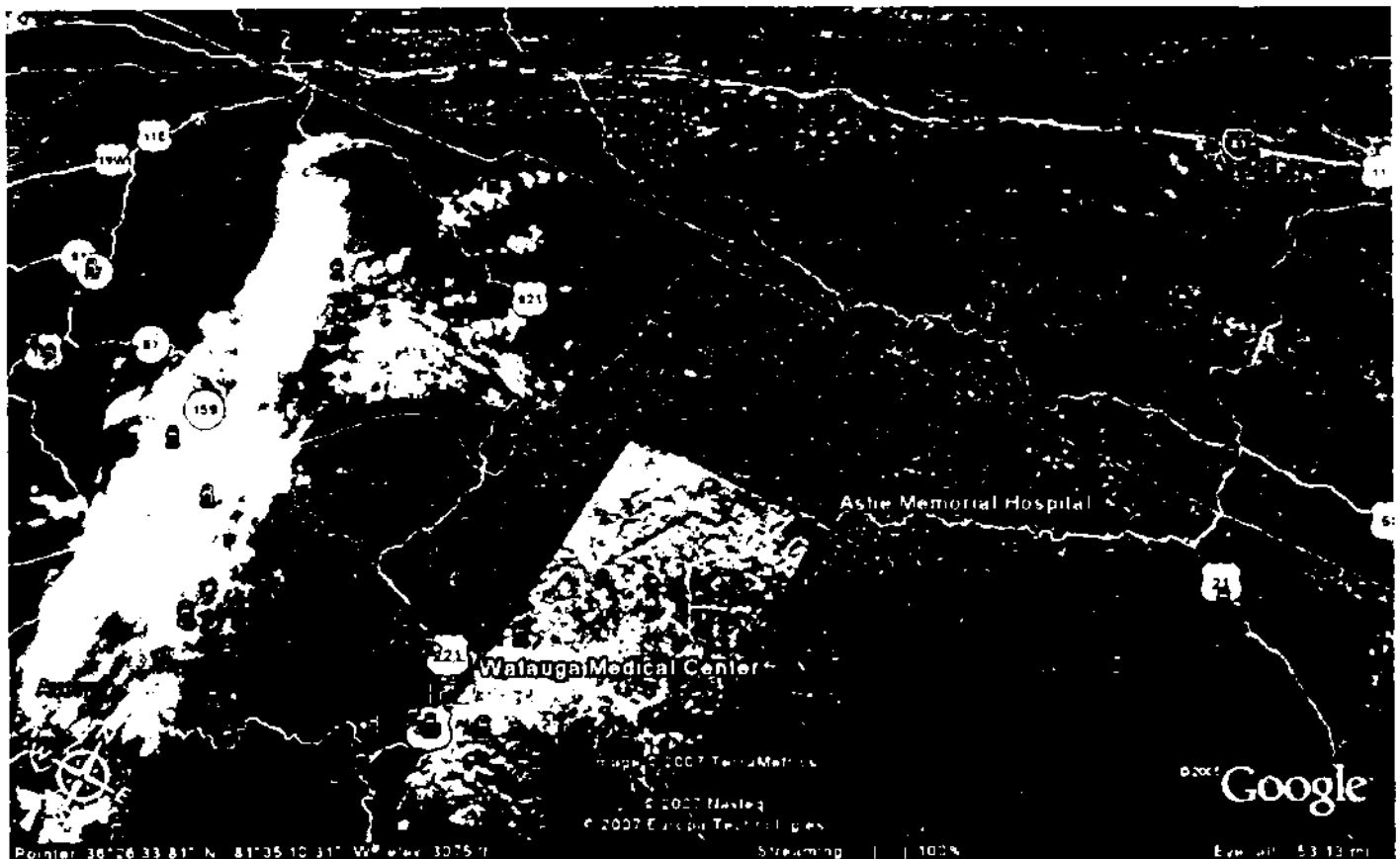
There are negative implications associated with leaving Ashe County for MRI services. Patients may experience increased costs associated with travel and time spent away from work. Ashe County residents are, on average older than

residents of North Carolina. According to North Carolina demographic estimates, in 2007 approximately 19% of Ashe County residents are 65 and older compared to only 12% in the State¹. This is important to consider because of the need to provide adequate access to fixed MRI services for medically underserved, i.e. Medicare and Medicaid. Patients may also experience delays obtaining diagnoses. It is inconvenient from a patient perspective to travel out of the county for MRI services that could be expanded locally. Emigration will simply continue if Ashe County fails to implement full-time fixed MRI services amidst its aged population and growing MRI utilization.

Geography

The geography of the region that AMH serves makes it important for the hospital to obtain a full-time fixed MRI scanner. The image below illustrates that the terrain is very mountainous between Ashe and Watauga counties.

Mountainous Ashe County



¹ North Carolina Office of State Budget and Management

Consequently, when the mobile MRI scanner is not on-site at AMH, a patient from Ashe County in need of MRI services must experience long travel times to receive an MRI scan. Winter weather can create dangerous driving conditions, making it even more difficult to travel to a distant county. Many of the roads in and surrounding Ashe County are small, two-lane roads that can become icy or hazardous during inclement weather. In an emergency, it may not always be possible for a patient to be immediately transferred to another facility for MRI services when the mobile scanner is not on-site at AMH. For these reasons, Ashe County residents need an adjusted need determination so that a fixed MRI scanner can be installed at AMH.

The geography of Ashe County can also have a direct impact on AMH's ability to provide mobile MRI services. In 2006, AMH experienced at least three or four days when the mobile MRI scanner could not travel to the hospital because winter weather conditions, e.g. snow and ice. This is significant when considering the fact that the mobile MRI scanner is only scheduled on site for 104 days per year. Further, 2006 was considered a mild winter; there have been previous winters when AMH has lost several more days of mobile MRI access because of treacherous driving conditions.

In the recent past, the SHCC has determined that hospitals located in mountainous regions indeed have special circumstances that may justify an adjusted need determination for a fixed MRI scanner. For example, in 2004, Highlands-Cashiers Hospital submitted a petition for an adjusted need determination based on its inability to obtain mobile MRI services for residents of Macon County. Similarly, AMH, on behalf of Ashe County residents, now seeks an adjusted need determination based on related circumstances.

MRI Use Rate

Increased MRI capabilities have changed the diagnostic approaches to many illnesses and disease states. MRI is the imaging modality of choice for an increasing number of conditions that local physicians see each day. As a result, MRI utilization rates are trending upward nationally, in North Carolina, and despite the limited access, in Ashe County as well. Please see the table below summarizing recent North Carolina utilization rates.

North Carolina MRI Utilization Rate History

Year	State Population	Number of Procedures	Use Rate/1000	Percent Change
2001	8,219,494	485,808	59.10	--
2002	8,336,829	543,635	65.21	10.3%
2003	8,417,255	592,888	70.44	8.0%
2004	8,562,210	653,504	76.32	8.4%
2005	8,663,674	719,447	83.04	8.7%
2006	8,860,341	785,445	88.65	6.8%

Source: Population data from N.C. State Office of Planning
MRI volume data from State Medical Facilities Plans
Totals may not foot due to rounding.

As noted in the table above, in FY2006 the North Carolina MRI use rate was 88.65 (per 1,000 population). Based on population data and MRI patient origin data provided by the DHHS Medical Facilities Planning Section, Ashe County has experienced an MRI use rate significantly lower than that of the State.

In FY2006, Ashe County's MRI use rate was 58.50 (1,508/ (25,778/1,000)), or 34% below the North Carolina MRI use rate. The low use rate in Ashe County is not the result of a lack of need for local fixed MRI services; rather it is indicative of a lack of access to services, and therefore of the need for increased access to fixed MRI scanners for local residents.

Ashe County has a lower MRI use rate compared to the State because the existing, limited mobile MRI service cannot adequately accommodate current demand for MRI services in Ashe County. This is further supported by the increasing number of Ashe County residents traveling out of county for MRI services. Thus, an additional fixed MRI scanner is needed in Ashe County.

SMEP MRI Need Determinations

As stated previously, AMH has provided MRI services for over 14 years. Since the implementation of a MRI need methodology in the 1999 SMEP there have been over 100 individual need determinations for fixed MRI scanners in North Carolina. However, none of these need determined fixed MRI scanner have been awarded in Ashe County.

The MRI need methodology has been modified three times in the six years since its inclusion in the SMEP. Two of these modifications occurred in the 2005 and

2006 SMFP. In the Proposed 2008 SMFP, AMH is 262 weighted MRI scans away from triggering a need determination for a fixed MRI scanner. AMH supports the SMFP MRI need methodology; however, based on the fact that in 2006 an additional 455 Ashe County residents traveled to Watauga County for MRI services, it is virtually impossible for AMH to experience the volume growth (484 unweighted MRI scans) necessary to trigger a fixed MRI need determination.

Adverse Effects on the Population of the Adjustment for a Dedicated Breast MRI Scanner is Not Made

Should this petition not be granted, residents of Ashe County would have to continue with the status quo. AMH would continue providing the existing, limited mobile MRI services. Ashe County patients requiring MRI scans will continue to face lengthy wait times because the mobile MRI scanner is only available on Sunday and Wednesday each week.

The status quo is not a cost effective alternative. Inpatients who need an MRI scan may incur an extended stay to have an MRI scan performed. This, in turn, increases AMH's length of stay and cost of operations. As AMH transitions toward to Critical Access Status, AMH's ability to reduce operating costs will only reduce healthcare costs because the State reimburses Critical Access hospitals based on cost rather than prospective payment. Thus, an adjusted need determination to include one fixed MRI scanner in Ashe County is a cost effective alternative to the status quo.

Mobile MRI scanners provide a valuable service to North Carolina; however, it is not the most cost effective alternative for Ashe County patients. Hospitals and freestanding facilities that host mobile MRI scanners experience higher costs due to the fee that must be paid to the mobile provider for each MRI scan. In FY2006, AMH's total annual cost related to its mobile MRI service was \$438,700. Based on AMH's access two days each week, this equates to an average \$4,218 each day (\$438,700/104 mobile days per year). Unfortunately, these higher costs must be transferred to the patients and payors.

If an adjusted need determination is not granted for Ashe County, patients and providers will experience increased charges and costs, respectively.

No Unnecessary Duplication of Services

Approving this petition will not result in any unnecessary duplication of services in Ashe County. AMH is the only MRI provider in the county. As stated previously, residents of Ashe County do not have timely and convenient access to local fixed MRI services. Patients currently travel at least 40 minutes to Watauga County for fixed MRI services. Should AMH obtain a fixed MRI scanner, it would discontinue its mobile MRI service.

Conclusion

In summary, AMH seeks an adjusted need determination in the 2008 SMFP to include one fixed MRI scanner for Ashe County, based on the following reasons:

- Ashe County has a high percent of patient emigration seeking MRI services outside the county.
- The low use rate in Ashe County is indicative of a lack of access to services and of the need for increased access to a fixed MRI scanner.
- Due to limited mobile access, the hospital is sometimes unable to meet the diagnostic imaging needs of its inpatients and must transfer them to another facility.
- Given the limited access to mobile MRI services and the inability to increase mobile availability, it is virtually impossible for AMH to experience the volume growth necessary to trigger a fixed MRI need determination.
- Ashe County has never had a need determination for a fixed MRI scanner.
- The lack of a need determination for a fixed MRI scanner in Ashe County has negative cost implications for patients and providers.
- Mobile MRI services are not the most effective option from an operational or patient perspective.

MOUNT JEFFERSON FAMILY MEDICINE

200 Hospital Avenue, Suite 3 ♦ Jefferson, NC 28640

Telephone 336-846-7433 ♦ FAX 336-846-7878

EDWARD J. MILLER, M.D.

VICKIE F. INGLEDUE, M.D.

M. CHAN BADGER, M.D.

MELINDA D. WONSICK, M.D.

August 3, 2007

Mr. Tom Elkins
Medical Facilities Planning Section
Division of Facility Services
701 Barbour Drive
2714 Main Service Center
Raleigh, NC 27699-2714

Re: Petition for Adjusted MRI Need Determination for Ashe County by
Ashe Memorial Hospital, Inc.

Dear Mr. Elkins:

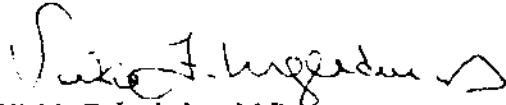
I am writing in support of Ashe Memorial Hospital's petition for an adjusted MRI need determination in Ashe County. As a physician that frequently utilizes MRI for evaluation and diagnosis of many conditions and diseases, I fully support Ashe Memorial's petition for one MRI scanner in Ashe County to be included in the 2008 State Medical Facilities Plan.

MRI capabilities have changed my diagnostic approach to many illnesses and disease states, as I suspect they have for many of the physicians in the medical community. MRI scanning is often the more superior imaging modality for an increasing number of disease states we see each day. But presently, my patients must wait several days to get an MRI scan in Ashe County. It is essential for patients to have timely access to MRI services.

Ashe County is also experiencing increases in population growth and an increasing demand for medical services, especially MRI. In order for the local medical community to remain responsive to patient care needs, it is vital that Ashe County have adequate resources to accommodate demand.

For these reasons, I fully support Ashe Memorial's petition for an adjusted MRI need determination for Ashe County.

Sincerely,



Vickie F. Ingledue, M.D.



200 Hospital Ave., Suite 7
Jefferson, NC 28640
(336) 846-7238

HIGH COUNTRY FAMILY MEDICINE

Kevin J. Kurtz, M.D.
Leigh Bradley, M.D.
Chris Campbell, M.D.

All Physicians are Board Certified by the American Academy of Family Physicians

August 3, 2007

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Medical Facilities Planning Section
Division of Facility Services
701 Barbour Drive
2714 Main Service Center
Raleigh, NC 27699-2714

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For these reasons, I fully support Ashe Memorial's petition for an adjusted MRI need determination for Ashe County.

Sincerely,

Kevin J. Kurtz, M.D.

Chauncey B. Santos, M.D. P.C.
Orthopedic Surgeon

P.O. Box 880
Jefferson, NC 28640

Telephone (336) 846-1222

August 3, 2007

Mr. Tom Elkins
Medical Facilities Planning Section
Division of Facility Services
701 Barbour Drive
2714 Main Service Center
Raleigh, NC 27699-2714

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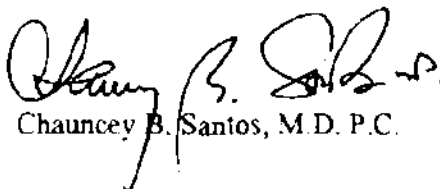
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For these reasons, I fully support Ashe Memorial's petition for an adjusted MRI need determination for Ashe County.

Sincerely,



Chauncey B. Santos, M.D. P.C.

**Technology and Equipment
Committee Meeting**

August 29, 2007

**MRI
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Comments Related To

MRI Petition-2: Ashe Memorial Hospital



Ashe Memorial Hospital

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MEDICAL FACILITIES
PLANNING SECTION

**SHCC Public Hearing Presentation Comments for
Adjusted Need Determination for Fixed MRI Scanner in Ashe County
July 13, 2007**

Good afternoon, my name is R.D. Williams. I am the Chief Executive Officer at Ashe Memorial Hospital. I am here today to speak on behalf of our petition for an adjusted need determination for one fixed MRI scanner in Ashe County to be included in the 2008 State Medical Facilities Plan. We will submit the petition to the Medical Facilities Planning Section by the August 3rd due date.

Ashe Memorial Hospital is a not-for-profit hospital located in the Blue Ridge Mountains, in the north-western corner of North Carolina. Ashe Memorial is a rural hospital that has a remarkably sophisticated level of care. Recently, we had the honor of being selected the 2006/2007 Outstanding Rural Health Organization of The Year. Our hospital is the only provider of MRI services in the county; however, due to mobile MRI availability, access is very limited for local residents. Thus, we are requesting that a need determination be included in the 2008 SMFP for a fixed MRI scanner in Ashe County. There are a number of reasons that justify an adjusted need determination:

Ashe Memorial began offering MRI services over 14 years ago. As the size of the Medical Staff increased and as patient care protocols trended to regularly utilize diagnostic MRI, Ashe Memorial responded by contracting with Alliance Imaging to obtain mobile MRI services. This was the first offering of MRI services in Ashe County and immediately benefited patients. Local residents have demonstrated an increasing demand for MRI services by increasing MRI utilization at Ashe Memorial each year.

Currently, our mobile MRI scanner is available only two days (Sunday and Wednesday) each week. Due to steadily increasing volumes and the increase in medical practice patterns that utilize MRI as a common diagnostic measure, Ashe Memorial Hospital has requested additional mobile days from its mobile provider. However, Alliance Imaging is unable to provide any additional days to us.

Additionally, as an acute care provider with a busy emergency department, Ashe Memorial needs to have MRI services available 24/7 for inpatients and emergency cases. Due to lack of availability of its mobile scanner, the hospital sometimes is unable to meet the diagnostic imaging needs of some of its inpatients and must transfer them to another facility. In fact, last year, we had to transfer several emergency and inpatients to an alternate facility because the mobile MRI service was not on-site. Consequently, in 2006, Ashe performed only 75 inpatient MRI procedures compared to 97 inpatient MRI procedures in 2005.

Ashe Memorial Hospital, the only hospital provider in Ashe County, is located in the heart of the Blue Ridge Mountains. The closest fixed MRI provider is located nearly 40 minutes away in Boone. According to patient origin information provided by the Division of Facility Services Planning Section, over 65% of Ashe County MRI patients must travel this distance for MRI services because they are not readily available locally. This is simply not acceptable from our perspective.

The geography of the region that Ashe Memorial serves makes it important for us to provide fixed MRI services. The terrain is very mountainous between Ashe and Watauga counties. Consequently, a patient from Ashe County in need of MRI services when the mobile MRI scanner is not located at the hospital must experience long travel times to receive an MRI scan. Also, winter weather can create dangerous driving conditions making it even more difficult to travel to fixed MRI sites. Many of the roads in and surrounding Ashe County are small, state roads that can become very icy during inclement weather. In an emergency, the chance exists that a patient may not be immediately transferred to another facility for MRI services. For these reasons, it can be extremely difficult for residents of Ashe County to travel outside of the county for MRI services.

Based on the Proposed 2008 SMFP data, Ashe Memorial is only 484 MRI scans away from triggering a need determination for a fixed MRI scanner. However, given our limited access to mobile MRI services and the inability to increase mobile availability, it is extremely difficult for Ashe Memorial to experience the 40% annual growth necessary to trigger a fixed MRI need determination. As I mentioned previously, due to lack of availability of its mobile scanner, Ashe performed only 75 inpatient MRI procedures in 2006 compared to 97 inpatient MRI procedures in 2005. It is virtually impossible for us to trigger a need determination due our limited mobile MRI access.

Another reason that supports our petition for an adjusted need determination is the fact that MRI utilization in Ashe County is far below the State's average use rate. Ashe County's MRI use rate is less than half of the North Carolina MRI use rate. The low use rate in Ashe County is not the result of a lack of need for local

fixed MRI services; rather it is indicative of a lack of access to services and of the need for increased access to a fixed MRI scanner for local residents. Ashe County's projected population growth further emphasizes the need for access to a fixed MRI scanner; otherwise the county use rate will continue to represent an underserved population.

The lack of a need determination for a fixed MRI scanner in Ashe County has negative cost implications for patients and providers, and thus adversely effects this population. Small rural hospitals, like Ashe Memorial, that host mobile MRI scanners experience higher costs due to the fee that must be paid to the mobile provider for each MRI scan. Unfortunately, these higher costs are often transmitted to the patients. As a current provider of mobile MRI services, Ashe Memorial calculates that, on average, approximately \$300 per scan is paid to the mobile MRI provider. Thus, in FY2006, this equates to approximately \$369,000 in fees that were paid to our mobile MRI provider. These costs are passed along to consumers.

Finally, aside from the lack of availability, mobile MRI services are not the most effective option from an operational or patient perspective. For example, reliability is not equivalent to that of fixed scanners. Each year Ashe Memorial experiences several days when its mobile MRI scanner is down due to factors associated with travel of the mobile unit. This results in an unnecessary delay of patient access to MRI services. Additionally, physical access to mobile service is less than ideal, because mobile MRI scanners are physically located outside a facility on a concrete pad. Physical access to mobile MRI scanners can be especially problematic in inclement weather. This creates an unnecessary burden for patients, especially the elderly or patients already in pain.

In summary, Ashe Memorial seeks an adjusted need determination to include one fixed MRI scanner in Ashe County in the 2008 SMFP, based on the following reasons:

- Due to limited mobile access, the hospital is sometimes unable to meet the diagnostic imaging needs of its inpatients and must transfer them to another facility.
- The low use rate in Ashe County is indicative of a lack of access to services and of the need for increased access to a fixed MRI scanner.
- The lack of a need determination for a fixed MRI scanner in Ashe County has negative cost implications for patients and providers
- Mobile MRI services are not the most effective option from an operational or patient perspective.
- Given our limited access to mobile MRI services and the inability to increase mobile availability, it is virtually impossible for Ashe Memorial

to experience the 40% annual growth necessary to trigger a fixed MRI need determination.

We feel there is a clear need for an additional fixed MRI scanner in Ashe County. We hope you will support us in this effort by approving this petition for an adjusted need determination. Thank you.